Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

LaSalle Parish Police Jury
LaSalle-Grant Sanitary Landfill
Jena, La Salle Parish, Louisiana
Agency Interest Number: 19447
Activity Number: PER20040001
Proposed Permit Number: 1680-00084-V0

I. APPLICANT

Company:
LaSalle Parish Police Jury
PO Box 1288
Jena, LaSalle Parish, Louisiana 71342-1288

Facility:
LaSalle-Grant Sanitary Landfill
Hwy 127
Jena, LaSalle Parish, Louisiana
Approximate UTM coordinates are 423.4 kilometers East and 3517.9 kilometers North

II. FACILITY AND CURRENT PERMIT STATUS

The LaSalle-Grant Landfill Committee owns the LaSalle-Grant landfill, a Type I and II solid waste landfill in LaSalle Parish, approximately 8 miles northwest of Jena, Louisiana. The LaSalle-Grant Sanitary Landfill began accepting waste prior to 1981. Solid Waste Permit No. P-0019 was originally issued to LaSalle-Grant on August 26, 1986 with several modifications increasing the landfill capacity approved since that time. The facility was not previously permitted and is required to obtain a Part 70 operating permit under New Source Performance Standards (NSPS) 40 CFR 60 Subpart WWW – Standards of Performance for Municipal Solid Waste (MSW) Landfills (40.CFR 60.750).

The current operator of the facility, IESI LA Landfill Corporation (IESI), submitted an Initial Design capacity report on March 2, 2004 with a permitted capacity estimated to be 2.8 million cubic meters and 2.2 million megagrams. A solid waste permit modification issued on June 15, 2004 increased permitted site volume to a total of approximately 23.95 million cubic meters or approximately 18.00 million megagrams.

LaSalle Parish Police Jury
LaSalle-Grant Sanitary Landfill
Jena, LaSalle Parish, Louisiana
Agency Interest Number: 19447

LaSalle-Grant Sanitary Landfill is a designated Part 70 source.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by IESI Landfill Corporation on December 9, 2004 requesting a Part 70 operating permit. Additional information dated December 12, 2006 and April 30, 2007 was also received.

Project

La Salle-Grant serves as a disposal facility for residential, commercial, municipal, and industrial (non-hazardous) wastes. It is a U.S. EPA source category landfill. The decomposing waste in the landfill produces gas that is primarily composed of methane and carbon dioxide. Numerous organic compounds are present in trace concentrations. There is one 10,000-diesel storage tank, a leachate treatment pond, and both gasoline and diesel fueled engines at the site.

Proposed Permit

Permit 1680-00084-V0 will be the initial Part 70 operating permit for the LaSalle-Grant Sanitary Landfill.

Permitted Air Emissions

Estimated emissions from the LaSalle-Grant Sanitary Landfill in tons per year are as follows:

Pollutant	Emissions
PM_{10}	1.11
SO_2	0.13
NO_X	1.43
CO	10.52
VOC	30.37

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance

with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

ID No.	Requirement	Notes
Facility Wide LaSalle-Grant Landfill	Chemical Accident Prevention Provisions [40 CFR 68]	DOES NOT APPLY. This facility does not process more than the threshold quantity of any regulated pollutant.
	NSPS Subpart Cc – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills [40 CFR 60.33c & 36c]	DOES NOT APPLY. This facility is subject to NSPS Subpart WWW.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.5901]	DOES NOT APPLY. A risk management plan is not required at this time since the threshold for a regulated substance is not exceeded.
ARE 5 Oxidation Pond	Control of Emissions of Organic Compounds – Fugitive Emissions Control [LAC 33: III.2121]	DOES NOT APPLY. Not an applicable facility as defined in this section.
	Control of Emissions of Organic Compounds – Limiting VOC Emissions from Industrial Wastewater [LAC 33: III.2153]	DOES NOT APPLY. Landfills are not covered under LAC 33: III.2153A.
EQT 1 Diesel Storage Tank	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978	DOES NOT APPLY. The tank capacity is less than 40,000 gallons.
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984.	DOES NOT APPLY. The tank capacity is less than 40,000 gallons.

LaSalle Parish Police Jury
LaSalle-Grant Sanitary Landfill
Jena, LaSalle Parish, Louisiana
Agency Interest Number: 19447

ID No.	Requirement	Notes
EQT 1 (cont) Diesel Storage Tank	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. The tank capacity is less than 19,800 gallons.
	Storage of Volatile Organic Compounds [LAC 33: III. 2103]	EXEMPT. Storage tank vapor pressure is less than 1.5 psia
EQT 2- EQT 9 All Engines	Emission Standards for Sulfur Dioxide Continuous Emissions Monitoring [LAC 33:III.1511.A] Emission Standards for Sulfur Dioxide Recordkeeping and Reporting [LAC 33:III.1513]	EXEMPT. Units emit less than 250 tons of SO_2 per year. Record and retain at the site for at least 2 years the data required to demonstrate compliance with or exemption from SO_2 standards of Chapter 15. Compliance data shall be reported annually in accordance with LAC 33:III.918.
EQT 2 , EQT 3, EQT 6-9 Engines Powering Pumps and Compressors	Control of Emissions of Organic Compounds – Pumps and Compressors [LAC 33: III.2111]	DOES NOT APPLY. Pumps and compressors at this facility handle only water or air.
EQT 2 – EQT 5 Diesel Engines	NSPS Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	DOES NOT APPLY. Engines were manufactured before April 1, 2006.

Prevention of Significant Deterioration/Nonattainment Review

This permit was reviewed for compliance with 40 CFR 70 and Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

LaSalle Parish Police Jury
LaSalle-Grant Sanitary Landfill
Jena, LaSalle Parish, Louisiana
Agency Interest Number: 19447

Streamlined Equipment Leak Monitoring Program

Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
LaSalle-Grant Sanitary Landfill	None	–	-

MACT Requirements

The facility is not a major source of Toxic Air Pollutants pursuant to LAC 33:III.Chapter 51.

Air Quality Analysis

Dispersion Model (s) Used: None

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

There is no permit shield requested in this permit action.

VI. PERIODIC MONITORING

Federal regulation 40 CFR 64 – Compliance Assurance Monitoring is not applicable to this facility.

The facility is required to recalculate the NMOC emission rate annually using the procedures specified in 40 CFR 60.754(a)(1) until such time as the calculated NMOC emission rate is greater than or equal to 50 Mg/yr or the landfill is closed.

LaSalle Parish Police Jury
LaSalle-Grant Sanitary Landfill
Jena, LaSalle Parish, Louisiana
Agency Interest Number: 19447

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H_2S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_X) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: $\geq$ 10 tons per year of any toxic air pollutant; $\geq$ 25 tons of total toxic air pollutants; and $\geq$ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10} – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

LaSalle Parish Police Jury
LaSalle-Grant Sanitary Landfill
Jena, LaSalle Parish, Louisiana
Agency Interest Number: 19447

Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.